

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> <u>September 24, 2009</u>
<b>SOKO KANNEH,</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>JUSTINE WRIGHT</b>	<b>:</b>	<b>18 U.S.C. § 371 (conspiracy to possess</b>
	<b>:</b>	<b>altered currency and false and fictitious</b>
	<b>:</b>	<b>items - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 472 (possession of altered</b>
	<b>:</b>	<b>currency - 2 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 514(a)(2) (possession of false or</b>
	<b>:</b>	<b>fictitious item - 2 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From on or about July 9, 2009, to on or about August 26, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**SOKO KANNEH, and**  
**JUSTINE WRIGHT**

conspired and agreed together to commit offenses against the United States; that is, to possess, pass, utter, conceal, and sell, and attempted to possess, pass, utter, conceal, and sell approximately \$400 or more of falsely made, forged, and counterfeited obligations of the United States, with intent to defraud, in violation of Title 18, United States Code, Section 472, and also, possessed, passed, uttered, presented, offered, and sold, and attempted to pass, utter, present, offer and sell, and aided and abetted these actions regarding, false and fictitious instruments, documents, and items, appearing, representing, purporting, and contriving through

scheme, to be an actual security and financial instrument issued under the authority of the United States, with with intent to defraud, in violation of Title 18, United States Code, Section 514(a)(2).

### **MANNER AND MEANS**

It was a part of the conspiracy that:

2. Defendants SOKO KANNEH and JUSTINE WRIGHT, possessed and attempted to sell black paper cut in the shape of United States currency, which they claimed to be genuine United States currency.

3. Defendants SOKO KANNEH and JUSTINE WRIGHT, cleaned blackened genuine \$100 United States currency bills and then claimed that the black paper cut in the shape of United States currency was also blackened genuine \$100 United States currency bills which could be cleaned in the same manner.

4. Defendants SOKO KANNEH and JUSTINE WRIGHT claimed that the black paper cut in the shape of United States currency was \$200,000 of genuine United States currency, and could be purchased for \$100,000.

### **OVERT ACTS**

In furtherance of the conspiracy and to effect the objects of the conspiracy, defendants committed the following overt acts, among others, in the Eastern District of Pennsylvania:

1. On or about July 9, 2009, defendants SOKO KANNEH and JUSTINE WRIGHT met with an intended victim and told the victim that they had blackened genuine United States currency which could be cleaned with a solution.

2. On or about July 9, 2009, defendants SOKO KANNEH and JUSTINE WRIGHT demonstrated for the intended victim how to two blackened genuine \$100 United States currency bills could be cleaned together with a non-blackened genuine \$100 bill and a solution.

3. On or about August 26, 2009, defendants SOKO KANNEH and JUSTINE WRIGHT met with a United States Secret Service (“S.S.”) undercover agent posing as a potential victim.

4. On or about August 26, 2009, defendants SOKO KANNEH and JUSTINE WRIGHT demonstrated for the S.S. undercover agent how two blackened genuine \$100 United States currency bills could be cleaned together with a non-blackened genuine \$100 bill and a solution.

5. On or about August 26, 2009, defendants SOKO KANNEH and JUSTINE WRIGHT attempted to sell to the S.S. undercover agent worthless black paper cut in the shape of United States currency for \$100,000, claiming that the black paper was \$200,000 of genuine United States currency which could be cleaned with the solution.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 9, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**SOKO KANNEH, and  
JUSTINE WRIGHT,**

with intent to defraud, possessed, passed, uttered, concealed and sold, and attempted to pass, utter and sell falsely made, forged, altered, and counterfeited obligations of the United States, and aided and abetted the possession, passing, uttering, concealing and sale, and attempts to do so, obligations of the United States, that is, approximately \$200 in altered Federal Reserve Notes.

In violation of Title 18, United States Code, Sections 472 and 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 26, 2009, in Philadelphia, in the Eastern District of  
Pennsylvania, defendant

**SOKO KANNEH, and  
JUSTINE WRIGHT,**

with intent to defraud, possessed, passed, uttered, concealed and sold, and attempted to pass,  
utter and sell falsely made, forged, altered, and counterfeited obligations of the United States, and  
aided and abetted the possession, passing, uttering, concealing and sale, and attempts to do so,  
obligations of the United States, that is, approximately \$200 in altered Federal Reserve Notes.

In violation of Title 18, United States Code, Sections 472 and 2.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 9, 2009, in Philadelphia, in the Eastern District of  
Pennsylvania, defendant

**SOKO KANNEH, and  
JUSTINE WRIGHT,**

with intent to defraud, possessed, passed, uttered, presented, offered, and sold, and attempted to pass, utter, present, offer and sell, and aided and abetted these actions regarding, false and fictitious instruments, documents, and items, appearing, representing, purporting, and contriving through scheme, to be an actual security and financial instrument issued under the authority of the United States.

In violation of Title 18, United States Code, Sections 514(a)(2) and 2.

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 26, 2009, in Philadelphia, in the Eastern District of  
Pennsylvania, defendant

**SOKO KANNEH, and  
JUSTINE WRIGHT,**

with intent to defraud, possessed, passed, uttered, presented, offered, and sold, and attempted to  
pass, utter, present, offer and sell, and aided and abetted these actions regarding, false and  
fictitious instruments, documents, and items, appearing, representing, purporting, and contriving  
through scheme, to be an actual security and financial instrument issued under the authority of  
the United States.

In violation of Title 18, United States Code, Sections 514(a)(2) and 2.

**A TRUE BILL:**

\_\_\_\_\_  
**FOREPERSON**

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**MICHAEL L. LEVY**  
**United States Attorney**